

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARILYN F. QUIRIN, as Executor of the  
Estate of RONALD J. QUIRIN, Deceased,

Plaintiff,

V.

LORILLARD TOBACCO COMPANY,  
*et al.*,

Defendants.

Civil Action No. 13-cv-02633

Judge Joan B. Gottschall

**DEFENDANT UNION CARBIDE CORPORATION'S MOTION TO JOIN AND ADOPT  
DEFENDANT GEORGIA-PACIFIC LLC'S MOTION *IN LIMINE* TO EXCLUDE THE  
TESTIMONY, WORK PRACTICE STUDIES, AND TYNDALL LIGHTING  
VIDEOTAPES OF PLAINTIFF'S EXPERT JAMES R. MILLETTE, PH.D.**

Defendant Union Carbide Corporation (“Union Carbide”) moves to join and adopt any and all of the arguments raised by Defendant Georgia Pacific, LLC in its Motion *In Limine* to Exclude the Testimony, Work Practice Studies, and Tyndall Lighting Videotapes of Plaintiff’s Expert James R. Millette, Ph.D., and states as follows:

1. Union Carbide opposes the introduction of the testimony and evidence Plaintiff seeks to admit through Plaintiff's expert James R. Millette, Ph.D. on the grounds that Dr. Millette's expert opinion is unreliable and the work practice studies, videotapes, and testimony of Dr. Millette are irrelevant, do not demonstrate a substantial similarity to the conditions of Mr. Quirin's alleged exposure, are misleading and unduly prejudicial, and are thus inadmissible.

2. In furtherance of judicial economy and in an effort not to burden this Court with duplicative arguments, Union Carbide hereby joins in Georgia Pacific, LLC's Motion *In Limine*

to Exclude the Testimony, Work Practice Studies, and Tyndall Lighting Videotapes of Plaintiff's Expert James R. Millette, Ph.D.

For the reasons contained therein, Union Carbide respectfully requests this Court grant Georgia Pacific, LLC's Motion *In Limine* to Exclude the Testimony, Work Practice Studies, and Tyndall Lighting Videotapes of Plaintiff's Expert James R. Millette, Ph.D.

Dated: August 1, 2013

Respectfully submitted,  
By: s/ Richard F. Bulger

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ATTORNEYS FOR UNION  
CARBIDE CORPORATION

**CERTIFICATE OF SERVICE**

I, Richard F. Bulger, an attorney, hereby certify that on August 1, 2013, I caused a true and correct copy of the foregoing DEFENDANT UNION CARBIDE CORPORATION'S MOTION TO JOIN AND ADOPT DEFENDANT GEORGIA-PACIFIC LLC'S MOTION *IN LIMINE* TO EXCLUDE THE TESTIMONY, WORK PRACTICE STUDIES, AND TYNDALL LIGHTING VIDEOTAPES OF PLAINTIFF'S EXPERT JAMES R. MILLETTE, PH.D. to be filed and served electronically via the court's CM/ECF system.

s/ Richard F. Bulger  
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